

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

STACEY PARKS-CARSON,	)
	)
Plaintiff,	)
	)
v.	)
	)
ALPHA RECOVERY CORPORATION,	)
	)
Defendant.	)

**COMPLAINT**

NOW COMES the Plaintiff, Stacey Parks-Carson, by and through undersigned counsel, and for her complaint against the Defendant, Alpha Recovery Corporation, Plaintiff states as follows:

**I. PRELIMINARY STATEMENT**

1. This is an action for actual and statutory damages for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA").

**II. JURISDICTION & VENUE**

2. Jurisdiction arises under 15 U.S.C. § 1692 and pursuant to 28 U.S.C. § 1331.
3. Venue is proper in this District in that Plaintiff resides here, Defendant transacts business here, and the conduct complained of occurred here.

**III. PARTIES**

4. Stacey Parks-Carson ("Plaintiff") is a natural person who resides in Florissant, Missouri.
5. Plaintiff is a "consumer" as that term is defined by the FDCPA, 15 U.S.C. § 1692a(3).

6. Alpha Recovery Corporation ("ARC") is a foreign corporation engaged in the collection of consumer debt within the State of Missouri.
7. ARC is a "debt collector" as that term is defined by the FDCPA, 15 U.S.C. § 1692a(6).

#### **IV. ALLEGATIONS**

8. The debt allegedly owed by Plaintiff was incurred primarily for personal, family, or household services and is therefore a "debt" as that term is defined by the FDCPA, 15 U.S.C. § 1692a(5).
9. On or about May 1, 2020, Plaintiff retained legal counsel to assist in the resolution of several debts, including the debt alleged sought by ARC.
10. On or about May 15, 2020, an employee of ARC contacted Plaintiff by telephone to discuss a debt allegedly owed by Plaintiff.
11. During the call, Plaintiff informed the ARC employee that she was represented by counsel, provided her counsel's contact information, and requested that all further communication be directed to her counsel.
12. Notwithstanding, ARC initiated additional communications to Plaintiff directly, including but not limited to telephone calls made on May 18, 2020 and May 27, 2020.
13. These communications by ARC violated 15 U.S.C. § 1692c(a)(2), in that ARC contacted a consumer after receiving notice that the consumer was represented by an attorney.

#### **V. PRAYER FOR RELIEF**

WHEREFORE Plaintiff Stacey Parks-Carson respectfully prays for judgment as follows:

- a. All actual compensatory damages suffered pursuant to 15 U.S.C. § 1692k(a)(1) from ARC and for Plaintiff;
- b. Statutory damages of \$1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2)(A) from ARC and for Plaintiff;
- c. Plaintiff's attorneys' fees and costs pursuant to 15 U.S.C. § 1692k(a)(3) from ARC and for Plaintiff;
- d. Any other relief deemed appropriate by this Honorable Court.

Respectfully submitted,

**By: /s/ Andrew M. Esselman**

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